

COMMERCIAL MOBILE RADIO SERVICES (CMRS) EMERGENCY TELEPHONE SERVICES BOARD

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November 18, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Alltel Corporation Petition for Limited Waiver
WT Docket No. 05-287/DA 05-2675

Dear Ms. Dortch:

On behalf of the Arkansas Commercial Mobile Radio Services (CMRS) Emergency Telephone Services Board, I am writing in support of Alltel's request for waiver seeking an extension of the FCC's December 31, 2005 E911 95 percent handset penetration deadline through June 30, 2007.

Over the years, we have worked closely and effectively with Alltel in deploying E-911 in our state. Alltel has been diligent in ensuring its network has the necessary capabilities, and the company has always been prompt and responsive to our public safety needs and concerns as deployment and/or service issues have arisen.

Alltel has also undertaken significant measures to inform customers about the benefits of E911 and to encourage its subscribers to obtain location-capable GPS handsets. As Alltel has explained, however, some customers have resisted upgrading their handsets to GPS models. In this case, strict enforcement of the December 31, 2005 deadline would unnecessarily inconvenience customers and could undermine public safety in some cases by preventing access to 911.

As a state board charged with working with PSAP's to protect public safety, we take our responsibilities seriously and we are thankful for all the hard work the Commission has engaged in on E911. At the same time, we believe Alltel has taken significant measures to encourage subscribers to upgrade their handsets and will continue to do so in the future. We therefore support Alltel's request for limited relief as in the best interests of the public.

Sincerely,

John Gibson

John Gibson, Chairman
Arkansas CMRS Board